Exhibit F

Subject: RE: Sony v. Cox - deposition notice

Date: Wednesday, March 27, 2019 at 10:48:55 PM Eastern Daylight Time

From: Golinveaux, Jennifer A.

To: Jeff Gould, Anderson, Sean R., Kearney, Thomas

CC: Kerry Mustico, Matt Oppenheim, Elkin, Michael S., Buchanan, Tom, Lane, Thomas Patrick

Attachments: image005.jpg, image007.jpg, image009.jpg, image011.jpg

Jeff,

I'm not sure where you are getting your information, but I do know that, like Atlanta, much of the San Francisco Bay Area is on spring break next week, including my sons' schools. We are working diligently towards getting you the billing report in advance of Mr. Mencher's deposition next week. Respectfully, we do not think your proposed stipulation is appropriate, as it would substantially impact the case schedule and particularly as this is an issue entirely of Plaintiffs' own making.

Regards, Jennifer

Jennifer Golinveaux

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WINSTON &STRAWN

From: Jeff Gould <Jeff@oandzlaw.com> Sent: Wednesday, March 27, 2019 9:14 AM

To: Golinveaux, Jennifer A. <JGolinveaux@winston.com>; Anderson, Sean R. <SRanderson@winston.com>; Kearney, Thomas <TKearney@winston.com>

Cc: Kerry Mustico <Kerry@oandzlaw.com>; Matt Oppenheim <Matt@oandzlaw.com>; Elkin, Michael S.

<MElkin@winston.com>; Buchanan, Tom <TBuchana@winston.com>; Lane, Thomas Patrick

<TLane@winston.com>

Subject: Re: Sony v. Cox - deposition notice

Jennifer – Thanks for your note. For the avoidance of doubt, please identify by topic number those topics on which Mr. Mencher will testify on April 5. In addition, and as you already know, we still need the billing/revenue information the Court ordered Cox to produce on February 15. That is obviously critical for Mr. Mencher's deposition and Plaintiffs' reserve all rights with respect to the untimeliness of that production.

Regarding spring break and scheduling other witnesses, we are sensitive to the fact that litigation can impact personal schedules and will try our best to work with you on scheduling within the parameters of the case schedule. We hope you will do the same. As an aside, I note that neither Washington, D.C., New York City nor San Francisco, among other areas, have spring break scheduled for the week of April 1, as I'm sure you know. In any event, given the unavailability of your witnesses next week and the uncertainty over the timing for those portions of the deposition, we should discuss broader scheduling promptly, including the expert report deadlines. You have not responded to my request below to adjust the expert schedule and it is therefore unclear if Cox is still considering it or declining

consent without discussion. Please let us know so we can address the issue accordingly.

Regards, Jeff

Jeffrey M. Gould

Oppenheim + Zebrak, LLP

202.851.4526 (direct)
jeff@oandzlaw.com

From: "Golinveaux, Jennifer A." < JGolinveaux@winston.com>

Date: Tuesday, March 26, 2019 at 9:02 PM

To: Jeff Gould < <u>Jeff@oandzlaw.com</u>>, "Anderson, Sean R." < <u>SRanderson@winston.com</u>>, "Kearney,

Thomas" < TKearney@winston.com >

Cc: Kerry Mustico < kerry@oandzlaw.com>, Matt Oppenheim < kerry@oandzlaw.com>, "Elkin, Michael S." < kerry@oandzlaw.com>, "Buchanan, Tom" < tBuchana@winston.com>, "Lane, Thomas Patrick" < tLane@winston.com>

Subject: RE: Sony v. Cox - deposition notice

Jeff,

Sandy Mencher, Vice President Finance & Accounting at Cox, is available for deposition next Friday, April 5. He will testify on the finance and revenue related topics in your notice, subject to Cox's objections thereto, which we will send under separate cover. Please advise on the location you have selected for the deposition.

Your self-serving characterization of Cox's discovery production is intended merely to justify Plaintiffs' delay in serving the deposition notice on Cox. Suffice it to say that we disagree with your characterization. As I am sure that you can appreciate, you cannot expect to serve a Rule 30(b)(6) notice with 49 topics on eleven day's notice for the week of spring break and expect witnesses to be available. We have jumped through hoops and rearranged schedules to make Mr. Mencher available for you next week. We are working to compile available dates for the other witnesses and will get back to you asap this week.

Regards, Jennifer

Jennifer Golinveaux

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WINSTON &STRAWN

From: Golinveaux, Jennifer A.

Sent: Tuesday, March 26, 2019 10:17 AM

To: 'Jeff Gould' < <u>Jeff@oandzlaw.com</u>>; Anderson, Sean R. < <u>SRanderson@winston.com</u>>; Kearney, Thomas

<TKearney@winston.com>

Cc: Kerry Mustico < Kerry@oandzlaw.com >; Matt Oppenheim < Matt@oandzlaw.com >; Elkin, Michael S.

<<u>MElkin@winston.com</u>>; Buchanan, Tom <<u>TBuchana@winston.com</u>>; Lane, Thomas Patrick

<<u>TLane@winston.com</u>>

Subject: RE: Sony v. Cox - deposition notice

Hi Jeff,

I'll respond on this later today. What location are you planning to use in Atlanta?

Jennifer

Jennifer Golinveaux

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WINSTON & STRAWN

From: Jeff Gould < <u>Jeff@oandzlaw.com</u>> Sent: Tuesday, March 26, 2019 7:50 AM

To: Golinveaux, Jennifer A. < <u>JGolinveaux@winston.com</u>>; Anderson, Sean R. < <u>SRanderson@winston.com</u>>;

Kearney, Thomas <TKearney@winston.com>

Cc: Kerry Mustico < Kerry@oandzlaw.com >; Matt Oppenheim < Matt@oandzlaw.com >; Elkin, Michael S.

< MElkin@winston.com >; Buchanan, Tom < TBuchana@winston.com >; Lane, Thomas Patrick

<<u>TLane@winston.com</u>>

Subject: Re: Sony v. Cox - deposition notice

Jennifer – Can you please respond promptly today to points 2 and 3 below as time is of the essence. We have a location in Atlanta re point 1 below so are all set there.

Thanks, Jeff

Jeffrey M. Gould

Oppenheim + Zebrak, LLP

202.851.4526 (direct)

jeff@oandzlaw.com

From: Jeff Gould < <u>Jeff@oandzlaw.com</u>>

Date: Monday, March 25, 2019 at 1:54 PM

To: "Golinveaux, Jennifer A." < <u>JGolinveaux@winston.com</u>>, "Anderson, Sean R." < <u>SRanderson@winston.com</u>>, "Kearney, Thomas" < <u>TKearney@winston.com</u>>

Cc: Kerry Mustico < Kerry@oandzlaw.com>, Matt Oppenheim < Matt@oandzlaw.com>, "Elkin, Michael S." < MElkin@winston.com>, "Lane, Thomas Patrick" < TLane@winston.com>

Subject: Re: Sony v. Cox - deposition notice

Jennifer – Thank you for your email.

First, as indicated in the deposition notice, Plaintiffs are amenable to a mutually agreeable location, including Atlanta, and can re-notice the deposition to reflect that. Do you have a specific location in mind in Atlanta or do you need us to provide one?

Second, please let us know immediately which witness and on what topics and days one witness is available the week of April 1. Additionally, please identify the other witnesses Cox intends to offer, including the topics on which each will testify.

Third, as I mentioned in my email below, Plaintiffs served this deposition notice when they did because of Cox's delay in producing documents. Had Cox produced documents sooner, Plaintiffs would have sought to take Cox's deposition sooner. Even as of today, critical documents needed for expert reports and Plaintiffs' Rule 30(b)(6) deposition of Cox have not yet been produced. This includes at least the billing/revenue information for the subscribers identified in Plaintiffs' notices, which the Court ordered Cox to produce on February 15 and which Cox represented on March 7 would "be completed in the next two weeks," or by March 21. Cox has not yet produced that information. Cox's delay in producing documents and now its unavailability of witnesses for prompt depositions the week of April 1 unduly prejudices Plaintiffs' ability to prepare expert reports by April 10. We reiterate our request that the other Rule 30(b)(6) witnesses be made available the week of April 1 and, if that is not possible, that Cox consents to extending Plaintiffs' expert report deadline to 10 days following completion of the Rule 30(b)(6) deposition.

Regards, Jeff

Jeffrey M. Gould

Oppenheim + Zebrak, LLP

202.851.4526 (direct)

jeff@oandzlaw.com

From: "Golinveaux, Jennifer A." < JGolinveaux@winston.com>

Date: Friday, March 22, 2019 at 6:50 PM

To: Jeff Gould < <u>Jeff@oandzlaw.com</u>>, "Anderson, Sean R." < <u>SRanderson@winston.com</u>>, "Kearney, Thomas" < <u>TKearney@winston.com</u>>

Cc: Kerry Mustico < kerry@oandzlaw.com>, Matt Oppenheim < kerry@oandzlaw.com>, "Elkin, Michael S." < kerry@oandzlaw.com>, "Buchanan, Tom" < tBuchana@winston.com>, "Lane, Thomas Patrick" < tLane@winston.com>

Subject: RE: Sony v. Cox - deposition notice

Dear Jeff:

I write regarding Plaintiffs' Rule 30(b)(6) notice to Cox, which you sent after hours Wednesday night, March 20. You have noticed 49 detailed topics and have noticed the deposition to begin in just over a week on Monday, April 1, at your offices in Washington, D.C. First, as you know, Cox is headquartered in Atlanta, where all of the anticipated 30(b)(6) designees work and reside. We ask that you re-notice the deposition for Atlanta. Second, you have noticed the deposition to commence on April 1 with barely a week's notice and no advance notice or communication to us whatsoever. We currently anticipate designating approximately six witnesses to cover the 49 topics in your notice. As

you may know, the week of April 1 is the spring break holiday from school for much of the country. Upon receipt of your notice Wednesday night, we have promptly checked availability with Cox's witnesses for that week. All but one are travelling for the spring break holiday and not available that week. Several will be out of the country. The individual who is in the office that week is checking to see if he could move things around to be available for deposition one day that week. We are checking availability the following two weeks for the other witnesses and will get back to you promptly.

Sincerely, Jennifer

Jennifer Golinveaux

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From: Jeff Gould < <u>Jeff@oandzlaw.com</u>>
Sent: Wednesday, March 20, 2019 7:19 PM

To: Golinveaux, Jennifer A. < <u>JGolinveaux@winston.com</u>>; Anderson, Sean R. < <u>SRanderson@winston.com</u>>;

Kearney, Thomas < TKearney@winston.com >

Cc: Kerry Mustico < Kerry@oandzlaw.com >; Matt Oppenheim < Matt@oandzlaw.com >

Subject: Sony v. Cox - deposition notice

Jennifer – Please see the attached Rule 30(b)(6) deposition notice to Cox. We would like to prioritize topics 1-10, 12-19, 22, 25-28, 33-36, and 38-41 in advance of the expert report deadlines and thus have noticed the deposition to commence on April 1, continuing from day to day thereafter. We would have served this notice sooner had we received Cox's documents sooner, and also note that critical documents still have not been produced (i.e. revenue/billing records). We are available to discuss scheduling, including identifying a mutually agreeable location.

Regards, Jeff

Jeffrey M. Gould

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